	Case 4:20-cv-03664-YGR Document 684-	-1 Filed 08/11/22 Page 1 of 12
1 2 3 4 5 6 7 8 9		
10	UNITED STATES	DISTRICT COURT
11	NORTHERN DISTRICT OF CAI	LIFORNIA, OAKLAND DIVISION
12		
13 14 15 16	CHASOM BROWN, WILLIAM BYATT, JEREMY DAVIS, CHRISTOPHER CASTILLO, and MONIQUE TRUJILLO, individually and on behalf of all similarly situated,	Case No. 4:20-cv-3664-YGR-SVK [PROPOSED] ORDER GRANTING MOTION TO SEAL Hon. Susan van Keulen, USMJ
17	Plaintiffs,	
18	V.	
19	GOOGLE LLC,	
20	Defendant.	
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[PROPOSED] ORDER

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Document

Request to Depose Google

Plaintiffs' Renewed

CEO Sundar Pichai

Exhibit A to Baeza

CABR-05468324)

Declaration (GOOG-

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Before the Court is Plaintiffs' Administrative Motion to File Under Seal Portions of Plaintiffs' Motion to Depose Google CEO Sundar Pichai, Dkt. 634 ("Motion"). Having considered the Motion, supporting declarations, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Portion of
Document Sought to
be Sealed

Pages: 2:22-27, 3:1,

portions at:

GRANTED as to the

3:3, 3:7-9

GRANTED as to the portions at:

Seal Entirely

The information requested to be sealed contains Google's highly confidential and

proprietary information regarding highly

Basis for Sealing Portion of Document

sensitive features of Google's internal systems and operations, including Google's internal projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to

The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers. and their proprietary functionalities, that Google maintains as

compromise Google's internal practices

relating to competing products.

1			confidential in the ordinary course of its
$_{2}\Vert$			business and is not generally known to the
_			public or Google's competitors. Such
3			confidential and proprietary information reveals Google's internal strategies,
_			system designs, and business practices for
4			operating and maintaining many of its
5			important services, and falls within the
_			protected scope of the Protective Order
6			entered in this action. See Dkt. 81 at 2-3.
7			Public disclosure of such confidential and
<i>'</i>			proprietary information could affect
8			Google's competitive standing as
9			competitors may alter their systems and
9			practices relating to competing products.
10			It may also place Google at an increased risk of cybersecurity threats, as third
			parties may seek to use the information to
11			compromise Google's internal practices
12			relating to competing products.
	Exhibit E to Baeza	GRANTED as to the	The information requested to be sealed
13	Declaration (Deposition of	portions at:	contains Google's highly confidential and
14	Chris Palmer)	D 110.10.11	proprietary information regarding highly
		Pages: 113:13-14,	sensitive features of Google's internal
15		187:17, 188:2, 188:7, 188:17, 188:23,	systems and operations, including Google's internal projects, identifiers, and
16		189:2, 189:6, 189:9,	their proprietary functionalities, that
		189:14, 189:18-21	Google maintains as confidential in the
17		,	ordinary course of its business and is not
18			generally known to the public or Google's
			competitors. Such confidential and
19			proprietary information reveals Google's
20			internal strategies, system designs, and business practices for operating and
20			maintaining many of its important
21			services, and falls within the protected
22			scope of the Protective Order entered in
22			this action. See Dkt. 81 at 2-3. Public
23			disclosure of such confidential and
			proprietary information could affect
24			Google's competitive standing as
25			competitors may alter their systems and practices relating to competing products.
			It may also place Google at an increased
26			risk of cybersecurity threats, as third
27			parties may seek to use the information to
			compromise Google's internal practices
28			relating to competing products.

1	Exhibit G to Baeza	GRANTED as to the	The information requested to be sealed
2	Declaration (GOOG-	portions at:	contains Google's highly confidential and
$2 \parallel$	BRWN-00391231)	D 221 222	proprietary information regarding highly
3		Pages: -231, -232	sensitive features of Google's internal
			systems and operations, including
4			Google's internal projects and identifiers, that Google maintains as confidential in
5			the ordinary course of its business and is
			not generally known to the public or
6			Google's competitors. Such confidential
7			and proprietary information reveals
			Google's internal strategies, system
8			designs, and business practices for
9			operating and maintaining many of its important services, and falls within the
			protected scope of the Protective Order
10			entered in this action. See Dkt. 81 at 2-3.
$_{11}$			Public disclosure of such confidential and
			proprietary information could affect
12			Google's competitive standing as
13			competitors may alter their systems and practices relating to competing products.
			It may also place Google at an increased
14			risk of cybersecurity threats, as third
15			parties may seek to use the information to
			compromise Google's internal practices
16	E 17711 D	CD ANTED 4 4	relating to competing products.
$_{17}\ $	Exhibit H to Baeza Declaration (GOOG-	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and
	CABR-04971903)	portions at.	proprietary information regarding highly
18		Page: -903	sensitive features of Google's internal
19			systems and operations, including
$ \begin{bmatrix} 1 \\ 1 \end{bmatrix} $			Google's internal projects and identifiers,
20			that Google maintains as confidential in the ordinary course of its business and is
21			not generally known to the public or
$_{22}$			Google's competitors. Such confidential
22			and proprietary information reveals
23			Google's internal strategies, system
$_{24}$			designs, and business practices for
∠ 4			operating and maintaining many of its important services, and falls within the
25			protected scope of the Protective Order
26			entered in this action. See Dkt. 81 at 2-3.
۷۵			Public disclosure of such confidential and
27			proprietary information could affect
28			Google's competitive standing as
ا ٥٧			competitors may alter their systems and

1			practices relating to competing products.
$_{2}\Vert$			It may also place Google at an increased
_			risk of cybersecurity threats, as third
3			parties may seek to use the information to
_ ,			compromise Google's internal practices
4	Exhibit L to Baeza	GRANTED as to the	relating to competing products. The information requested to be sealed
5	Declaration (GOOG-	portions at:	contains Google's highly confidential and
	CABR-04991831)	r	proprietary information regarding highly
6		Page: -831	sensitive features of Google's internal
7			systems and operations, including
			Google's internal projects and identifiers,
8			that Google maintains as confidential in the ordinary course of its business and is
9			not generally known to the public or
			Google's competitors. Such confidential
10			and proprietary information reveals
11			Google's internal strategies, system
			designs, and business practices for
12			operating and maintaining many of its
13			important services, and falls within the protected scope of the Protective Order
			entered in this action. See Dkt. 81 at 2-3.
14			Public disclosure of such confidential and
15			proprietary information could affect
1.			Google's competitive standing as
16			competitors may alter their systems and practices relating to competing products.
17			It may also place Google at an increased
10			risk of cybersecurity threats, as third
18			parties may seek to use the information to
19			compromise Google's internal practices
20	E 132M. D	CD ANTED 4 4	relating to competing products.
20	Exhibit M to Baeza Declaration	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and
21	(GOOG-BRWN-	portions at.	proprietary information regarding highly
$_{22}$	00140297)	Pages: -311-313, -	sensitive features of Google's internal
		315-319, -323, -325, -	systems and operations, including various
23		327-329	types of Google's internal projects,
$_{24}$			identifiers, and their proprietary functionalities, that Google maintains as
			confidential in the ordinary course of its
25			business and is not generally known to the
26			public or Google's competitors. Such
			confidential and proprietary information
27			reveals Google's internal strategies,
28			system designs, and business practices for operating and maintaining many of its
-			operating and maintaining many of its

1			important services, and falls within the
$_{2}\Vert$			protected scope of the Protective Order
-			entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and
3			proprietary information could affect
4			Google's competitive standing as
_			competitors may alter their systems and
5			practices relating to competing products.
6			It may also place Google at an increased
0			risk of cybersecurity threats, as third
7			parties may seek to use the information to compromise Google's internal practices
$_{8}\ $			relating to competing products.
8	Exhibit N to Baeza	GRANTED as to the	The information requested to be sealed
9	Declaration (GOOG-	portions at:	contains Google's highly confidential and
10	CABR-05126022)	_	proprietary information regarding highly
10		Page -023	sensitive features of Google's internal
11			systems and operations, including
12			Google's internal projects and identifiers, that Google maintains as confidential in
12			the ordinary course of its business and is
13			not generally known to the public or
14			Google's competitors. Such confidential
17			and proprietary information reveals
15			Google's internal strategies, system
16			designs, and business practices for operating and maintaining many of its
			important services, and falls within the
17			protected scope of the Protective Order
18			entered in this action. See Dkt. 81 at 2-3.
			Public disclosure of such confidential and
19			proprietary information could affect Google's competitive standing as
20			competitors may alter their systems and
			practices relating to competing products.
21			It may also place Google at an increased
22			risk of cybersecurity threats, as third
			parties may seek to use the information to
23			compromise Google's internal practices relating to competing products.
24	Exhibit O to Baeza	GRANTED as to the	The information requested to be sealed
<u> </u>	Declaration	portions at:	contains Google's highly confidential and
25	(GOOG-CABR-04675770)		proprietary information regarding highly
26		Pages: -770-771	sensitive features of Google's internal
27			systems and operations, including Google's internal projects and identifiers,
27			that Google maintains as confidential in
28			the ordinary course of its business and is

not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. Exhibit P to Baeza Declaration (Deposition of Rory MeClelland) Exhibit P to Baeza Declaration (Pages: 118:2, 118:7, 118:12, 118:15-16, 118:23, 120:4-5, 120:11 Exhibit P to Baeza Declaration (Pages: 118:2, 118:7, 118:15-16, 118:23, 120:4-5, 120:11 Exhibit P to Baeza Declaration (Pages: 118:2, 118:7, 118:15-16, 118:23, 120:4-5, 120:11 Exhibit P to Baeza Declaration (Pages: 118:2, 118:7, 118:15-16, 118:23, 120:4-5, 120:11 Exhibit P to Baeza Declaration (Pages: 118:2, 118:7, 118:15-16, 118:23, 120:4-5, 120:11 Exhibit P to Baeza Declaration (Pages: 118:2, 118:7, 118:15-16, 118:23, 120:4-5, 120:11 Exhibit Q to Baeza Declaration (Pages: 118:2, 118:15-16, 118:25) Exhibit Q to Baeza Declaration (Pages: 118:2, 118:15-16, 118:25) Exhibit Q to Baeza Declaration (Pages: 118:2, 118:15-16, 118:25) Exhibit Q to Baeza Declaration (Pages: 118:2, 118:15-16, 118:25) Exhibit Q to Baeza Declaration (Pages: 118:2, 118:15-16, 118:25) Exhibit Q to Baeza Declaration (Pages: 118:2, 118:15-16, 118:25) Exhibit Q to Baeza Declaration (Pages: 118:2, 118:15-16, 118:25) Exhibit Q to Baeza Declaration (Pages: 118:2, 118:15-16, 118:25) Exhibit Q to Baeza Declaration (Pages: 118:2, 118:15-16, 118:25) Exhibit Q to Baeza Declaration (Pages: 118:2, 118:15-16, 118:25) Exhibit Q to Baeza Declaration (Pages: 118:2, 118:15-16, 118:25) Exhibit Q				
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Exhibit P to Baeza Declaration (Deposition of Rory McClelland) Pages: 118:2, 118:7, 118:12, 118:15-16, 118:23, 120:4-5, 120:11 Declaration (Deposition of Rory McClelland) Declaration (Deposition of Rory McClelland) Declaration (Deposition of Rory McClelland) Pages: 118:2, 118:7, 118:15-16, 118:23, 120:4-5, 120:11 Declaration (Deposition of Rory McClelland) Declaration (Deposition of Rory McClelland) Declaration (Deposition of Rory McClelland) Pages: 118:2, 118:7, 118:15-16, 118:23, 120:4-5, 120:11 Declaration (Deposition of Rory McClelland) Declaration (Deposition of Rory McClelland) Pages: 118:2, 118:7, 118:15-16, 118:23, 120:4-5, 120:11 Declaration (Deposition of Rory McClelland) Pages: 118:2, 118:7, 118:15-16, 118:23, 120:4-5, 120:11 Declaration (Deposition of Rory McClelland) Pages: 118:2, 118:7, 118:12, 118:15-16, 118:23, 120:4-5, 120:11 Declaration (Deposition of Rory McClelland) Pages: 118:2, 118:7, 118:12, 118:15-16, 118:23, 120:4-5, 120:11 Declaration (Google's internal projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. Exhibit Q to Baeza GRANTED as to the The information requested to be sealed	11			
13 (Deposition of Rory McClelland) Pages: 118:2, 118:7, 118:15-16, 118:23, 120:4-5, 120:11 Pages: 118:2, 118:7, 118:15-16, 118:23, 120:4-5, 120:11 16 17 18 18 19 19 20 20 21 20 21 22 22 23 24 25 26 26 27 Exhibit Q to Baeza Grante Deposition of Rory McClelland) Pages: 118:2, 118:7, 118:15-16, 118:23, 120:4-5, 120:11 Pages: 118:2, 118:7, 18:15-16, 19:04-18, 18:05 10:0	12			The information requested to be sealed
Pages: 118:2, 118:7, 118:12, 118:15-16, 118:23, 120:4-5, 120:11 Pages: 118:2, 118:15-16, 118:23, 120:4-5, 120:11 Pages: 118:15-16, 118:23, 120:4-5, 120:11 Pages: 118:2, 118:7, 118:15-16, 120:11 Pages: 118:2, 118:7, 118:15-16, 120:11 Sensitive features of Google's internal systems and operations, including Google's internal projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information seveals important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. Exhibit Q to Baeza GRANTED as to the The information requested to be sealed	13		portions at:	
118:12, 118:15-16, 118:23, 120:4-5, 120:11 118:12, 118:15-16, 118:23, 120:4-5, 120:11 118:13, 120:4-5, 120:11 118:15-16, 118:23, 120:4-5, 120:11 118:15-16, 118:23, 120:4-5, 120:11 118:15-16, 118:23, 120:4-5, 120:11 118:15-16, 118:23, 120:4-5, 120:11 118:15-16, 118:23, 120:4-5, 120:11 118:15-16, 118:23, 120:4-5, 120:11 118:15-16, 118:23, 120:4-5, 120:11 118:15-16, 118:23, 120:4-5, 120:11 118:15-16, 118:23, 120:4-5, 120:11 118:15-16, 118:23, 120:4-5, 140:4-4, 140:4-		McClelland)	Pages: 118:7	
that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. Exhibit Q to Baeza GRANTED as to the The information requested to be sealed	14			
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Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. Exhibit Q to Baeza GRANTED as to the The information requested to be sealed				I - I
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operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. Exhibit Q to Baeza GRANTED as to the The information requested to be sealed	10			
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21 Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. Exhibit Q to Baeza GRANTED as to the The information requested to be sealed	20			_
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proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. Exhibit Q to Baeza GRANTED as to the The information requested to be sealed	22			
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practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. Exhibit Q to Baeza GRANTED as to the The information requested to be sealed	23			
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parties may seek to use the information to compromise Google's internal practices relating to competing products. Exhibit Q to Baeza GRANTED as to the The information requested to be sealed				
compromise Google's internal practices relating to competing products. Exhibit Q to Baeza GRANTED as to the The information requested to be sealed	25			· · · · · · · · · · · · · · · · · · ·
27 relating to competing products. Exhibit Q to Baeza GRANTED as to the The information requested to be sealed	26			
Exhibit Q to Baeza GRANTED as to the The information requested to be sealed	$_{27}\ $			
28 Declaration portions at: contains Google's highly confidential and				The information requested to be sealed
	28	Declaration	portions at:	contains Google's highly confidential and

1	(Deposition of Abdelkarim Mardini)	Pages: 317:7, 317:14-	proprietary information regarding highly sensitive features of Google's internal
2		15, 317:22-23, 318:1-	systems and operations, including various
3		2, 318:4, 318:15- 319:8, 319:14, 371:7-	types of Google's internal projects, identifiers, and their proprietary
4		10, 371:13-15,	functionalities, that Google maintains as
5		371:22-23,372:1-2, 373:14,18,373:22-24	confidential in the ordinary course of its business and is not generally known to the
6			public or Google's competitors. Such
7			confidential and proprietary information reveals Google's internal strategies,
			system designs, and business practices for operating and maintaining many of its
8			important services, and falls within the
9			protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3.
10			Public disclosure of such confidential and
11			proprietary information could affect Google's competitive standing as
12			competitors may alter their systems and
13			practices relating to competing products. It may also place Google at an increased
14			risk of cybersecurity threats, as third
15			parties may seek to use the information to compromise Google's internal practices
13			relating to competing products.
16	Exhibit R to Baeza Declaration	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and
17	(Deposition of Chetna Bindra)	•	proprietary information regarding highly
18	Diliula)	Pages: 218:11-13	sensitive features of Google's internal systems and operations, including
19			Google's internal projects and identifiers,
20			that Google maintains as confidential in the ordinary course of its business and is
21			not generally known to the public or Google's competitors. Such confidential
$_{22}$			and proprietary information reveals
23			Google's internal strategies, system designs, and business practices for
			operating and maintaining many of its
24			important services, and falls within the protected scope of the Protective Order
25			entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and
26			proprietary information could affect
27			Google's competitive standing as competitors may alter their systems and
28			practices relating to competing products.
- 11			

1			It may also place Google at an increased
$_{2}\Vert$			risk of cybersecurity threats, as third
_			parties may seek to use the information to
3			compromise Google's internal practices
,	Exhibit S to Baeza	GRANTED as to the	relating to competing products. The information requested to be sealed
4	Declaration	portions at:	contains Google's highly confidential and
5	(GOOG-BRWN-	portions at:	proprietary information regarding highly
	00388293)	Page: -295	sensitive features of Google's internal
6			systems and operations, including
7			Google's internal communication
			channels, that Google maintains as
8			confidential in the ordinary course of its business and is not generally known to the
9			public or Google's competitors. Such
10			confidential and proprietary information
10			reveals Google's internal strategies,
11			system designs, and business practices for
12			operating and maintaining many of its important services, and falls within the
12			protected scope of the Protective Order
13			entered in this action. See Dkt. 81 at 2-3.
14			Public disclosure of such confidential and
14			proprietary information could affect
15			Google's competitive standing as
16			competitors may alter their systems and practices relating to competing products.
			It may also place Google at an increased
17			risk of cybersecurity threats, as third
18			parties may seek to use the information to
			compromise Google's internal practices
19	Exhibit T to Baeza	GRANTED as to the	relating to competing products. The information requested to be sealed
20	Declaration	portions at:	contains Google's highly confidential and
	(Deposition of Lorraine		proprietary information regarding highly
21	Twohill)	Page: 120:6-12	sensitive features of Google's internal
22			systems and operations, including various
22			types of Google's internal projects, and their proprietary functionalities, that
23			Google maintains as confidential in the
24			ordinary course of its business and is not
25			generally known to the public or Google's
23			competitors. Such confidential and
26			proprietary information reveals Google's internal strategies, system designs, and
27			business practices for operating and
			maintaining many of its important
28			services, and falls within the protected
- 11			

1			scope of the Protective Order entered in
$_{2}\Vert$			this action. See Dkt. 81 at 2-3. Public
			disclosure of such confidential and
3			proprietary information could affect Google's competitive standing as
$_{4}\ $			competitors may alter their systems and
			practices relating to competing products.
5			It may also place Google at an increased
6			risk of cybersecurity threats, as third
			parties may seek to use the information to compromise Google's internal practices
7			relating to competing products.
$8 \parallel$	Exhibit V to Baeza	GRANTED as to the	The information requested to be sealed
9	Declaration (GOOG-CABR-00501220)	portions at:	contains Google's highly confidential and
9	(GOOG-CADIC-00301220)	Pages: -221-222, -	proprietary information regarding highly sensitive features of Google's internal
10		224-225	systems and operations, including various
11		- -	types of Google's internal projects,
			identifiers, and their proprietary
12			functionalities, that Google maintains as
13			confidential in the ordinary course of its business and is not generally known to the
			public or Google's competitors. Such
14			confidential and proprietary information
15			reveals Google's internal strategies,
16			system designs, and business practices for operating and maintaining many of its
			important services, and falls within the
17			protected scope of the Protective Order
18			entered in this action. See Dkt. 81 at 2-3.
10			Public disclosure of such confidential and proprietary information could affect
19			Google's competitive standing as
20			competitors may alter their systems and
$_{21}$			practices relating to competing products.
			It may also place Google at an increased risk of cybersecurity threats, as third
22			parties may seek to use the information to
23			compromise Google's internal practices
24	E 1714V. D	CD ANTED 4 4	relating to competing products.
24	Exhibit Y to Baeza Declaration	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and
25	(GOOG-CABR-05756489)	Portions at.	proprietary information regarding highly
26		Pages: -491, -494, -	sensitive features of Google's internal
		499-501, -504-505, -	systems and operations, including various
27		507-512	types of Google's internal projects, identifiers, and their proprietary
28			functionalities, that Google maintains as
			, , , , , , , , , , , , , , , , , , , ,

1			confidential in the ordinary course of its
$_{2}\Vert$			business and is not generally known to the
			public or Google's competitors. Such
3			confidential and proprietary information
,			reveals Google's internal strategies,
4			system designs, and business practices for operating and maintaining many of its
5			important services, and falls within the
			protected scope of the Protective Order
6			entered in this action. See Dkt. 81 at 2-3.
7			Public disclosure of such confidential and
´			proprietary information could affect
8			Google's competitive standing as
9			competitors may alter their systems and
9			practices relating to competing products. It may also place Google at an increased
10			risk of cybersecurity threats, as third
_			parties may seek to use the information to
11			compromise Google's internal practices
12			relating to competing products.
12	Exhibit Z to Baeza	GRANTED as to the	The information requested to be sealed
13	Declaration (GOOG- BRWN-00406065)	portions at:	contains Google's highly confidential and
14	BRW11 00400003)	Dogge 065 060	proprietary information regarding highly
1.5		Pages: -065-069	sensitive features of Google's internal systems and operations, including various
15			types of Google's internal projects,
16			identifiers, and their proprietary
			functionalities, that Google maintains as
17			confidential in the ordinary course of its
18			business and is not generally known to the
10			public or Google's competitors. Such confidential and proprietary information
19			reveals Google's internal strategies,
20			system designs, and business practices for
			operating and maintaining many of its
21			important services, and falls within the
22			protected scope of the Protective Order
			entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and
23			proprietary information could affect
24			Google's competitive standing as
			competitors may alter their systems and
25			practices relating to competing products.
26			It may also place Google at an increased
			risk of cybersecurity threats, as third
27			parties may seek to use the information to compromise Google's internal practices
28			relating to competing products.
_		1	remains to competing products.

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- 1			
1	Proposed Order	GRANTED as to the	The information requested to be sealed
2		portions at:	contains Google's highly confidential and proprietary information regarding highly
3		Page: 6:2, 6:4-5, 6:7-	sensitive features of Google's internal
		8, 6:11, 6:16, 6:18,	systems and operations, including
4		6:28	Google's internal projects and identifiers, that Google maintains as confidential in
5			the ordinary course of its business and is
6			not generally known to the public or
7			Google's competitors. Such confidential and proprietary information reveals
			Google's internal strategies, system
8			designs, and business practices for operating and maintaining many of its
9			important services, and falls within the
10			protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3.
11			Public disclosure of such confidential and
			proprietary information could affect
12			Google's competitive standing as competitors may alter their systems and
13			practices relating to competing products.
14			It may also place Google at an increased risk of cybersecurity threats, as third
15			parties may seek to use the information to
16			compromise Google's internal practices relating to competing products.
			relating to competing products.
17	SO ORDERED.		
18			
19			
20	DATED:		N. SUSAN VAN KEULEN
21	United States Magistrate Judge		
22			
23			
24			
25			
26			
27			
28			
	1	[PR	ROPOSED] ORDER GRANTING MOTION TO SEAL